

EXHIBIT Q

PAULA LUDWIG Confidential
THE BASU GROUP vs SEVENTH AVENUE

November 18, 2016
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- 1 A. Correct, they go direct to the vendors.
- 2 Q. Okay. Have you ever heard of Shankar, S-H-A-N-K-A-R,
- 3 Produce Co, PBT, period, Ltd., period?
- 4 A. Yes.
- 5 Q. Have you ever heard of Anusha, A-N-U-S-H-A,
- 6 Merchandising?
- 7 A. Correct.
- 8 Q. Have you ever heard of Manju, M-A-N-J-U-- I'm going to
- 9 say--
- 10 A. Mittal.
- 11 Q. M-I-T-T-A-L?
- 12 A. Yes.
- 13 Q. Is that a him or her?
- 14 A. She.
- 15 Q. Have you ever heard of Anurag, A-N-U-R-A-G, Chokhany,
- 16 C-H-O-K-H-A-N-Y?
- 17 A. No.
- 18 Q. To your knowledge, what is Shankar Produce?
- 19 A. The factory that we're purchasing the red peacock
- 20 handbag from.
- 21 Q. And what is Anusha Merchandising?
- 22 A. That's the name of the agency that brought the handbags
- 23 to us, to offer them to us.
- 24 Q. Did you ever deal directly with Shankar Produce?
- 25 A. No.

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*** CONFIDENTIAL ***

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

X

3 THE BASU GROUP, INC.,

4 Plaintiff,

6 vs.

7 SEVENTH AVENUE, INC.,

8 Defendant.

X

Civil Action No.:
16-cv-00461-PGG
ECF CASE

13 Deposition of PAULA LUDWIG

14 Friday, November 18, 2016

16 10:15 a.m.

17 At

18 Seventh Avenue, Inc.
19 1112 7th Avenue
20 Monroe, Wisconsin 53566

23 Reported by Sheila K. Fairchild
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DEPOSITION of PAULA LUDWIG, a witness in the
above-entitled action, was taken at the instance of the
Plaintiff, under and pursuant to the Rule 30 (b) (6),
Federal Rules of Civil Procedure, pursuant to notice,
before me, SHEILA K. FAIRCHILD, Professional Court
Reporter and Notary Public, in and for the State of
Wisconsin, at the offices of Seventh Avenue, Inc., 1112
7th Avenue, Monroe, Wisconsin, on the 18th day of
November, 2016, commencing at 10:15 a.m. and concluding
at 2:10 p.m.

APPEARANCES:

MYERS WOLIN, LLC

MICHAEL R. GILMAN

100 Headquarters Plaza

Morristown, New Jersey 07960

Appeared on behalf of the Plaintiff.

LADAS & PARKY, LLP

DAVID C. BREZINA

224 South Michigan Avenue, Suite 1600

Chicago, Illinois 60604

Appeared on behalf of the Defendant.



8, 2016
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COLONY BRANDS ASSOCIATE GENERAL COUNSEL

TIMOTHY ENGLING

1112 7th Avenue

Monroe, Wisconsin 53566-1364

appeared on behalf of the Defendant.

ALSO PRESENT: Russell Davis, President Seventh Avenue,
Inc.



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